

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:11CV01920 AGF
)	
NINE THOUSAND, SIX)	
HUNDRED DOLLARS (\$9,600.00))	
U.S. CURRENCY,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULING PLAN

Comes now, the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Jennifer A. Winfield, Assistant United States Attorney for said district, and claimant Larry Bell, by and through his attorney, Scott Rosenblum, and provides the Court with the following scheduling plan:

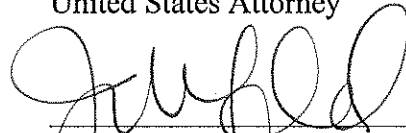
- (a) All parties agree that this matter should be set under Track 2.
- (b) All parties agree that there will be no joinder of parties, and that all parties may have until June 23, 2012 to amend the pleadings.
- (c) All parties have agreed to the following discovery plan:
 - (i) All parties agree to disclose electronically stored information, if any;
 - (ii) All parties agree there is no evidence which requires claims of privilege or of protection as trial-preparation material after production;
 - (iii) Both parties are exempt from disclosure of Rule 26(a)(1) material pursuant to Rule 26(a)(1)(B)(ii);

- (iv) All parties agree that discovery will not be conducted in phases or limited to certain issues;
- (v) All parties agree that:
 - (1) Plaintiff's disclosure of expert witness information shall be completed no later than July 31, 2012 and shall make expert witnesses available for depositions no later than August 21, 2012.
 - (2) Claimant's disclosure of expert witness information shall be completed no later than September 4, 2012 and shall make expert witnesses available for depositions no later than September 25, 2012.
 - (3) If the evidence is intended solely to contradict or rebut evidence on the same subject matter identified by another party, that information shall be disclosed within 30 days after the disclosure made by another party.
- (vi) All parties agree that the presumptive limits of ten depositions and twenty five interrogatories per party as set forth in Rule 33 and 34, Fed. R. Civ. P. should apply to this case;
- (vii) All parties agree that there will not be any physical or mental examinations of parties in this matter;
- (viii) All parties agree that discovery shall be completed by November 5, 2012;
- (ix) There are no other matters pertinent to discovery in this case;
- (d.) All parties agree that no referral to mediation or early neutral evaluation shall occur;
- (e.) All parties agree that any dispositive motions notice shall be filed by December 5, 2012;
- (f.) All parties agree that this case should be ready for trial by March 25, 2013;
- (g.) All parties agree that this case should take two days to try to verdict;

(h.) All parties agree that there are no other matters for inclusion in the Joint Scheduling Plan.

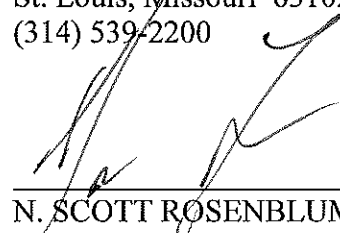
Respectfully submitted,

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